

FILED
Clerk
District Court

IN THE UNITED STATES DISTRICT COURT AUG 31 2006
FOR THE For The Northern Mariana Islands
NORTHERN MARIANA ISLANDS By _____
(Deputy Clerk)

ABELLANOSA, JOANNA, et al.,

Plaintiffs,

v.

L&T INTERNATIONAL
CORPORATION,

Defendant.

Civil Action No. 05-0010

**DECLARATION OF JOE HILL
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT/RULE
56(f) AFFIDAVIT**

JOE HILL

Hill Law Offices
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I, JOE HILL, hereby declare as follows:

1. I am over the age of eighteen years old, have personal knowledge of the facts set forth herein, am competent to testify as to these facts if called as a witness in a court of law, and if called would testify as stated herein.
2. I represent as counsel, the 76 female-plaintiffs in this action
3. It is extremely difficult if not impossible for me to obtain individual affidavits from each plaintiff to refute all factual allegations raised in Defendant's Motion For Summary Judgment on all claims asserted by Defendant, especially in the time allowed under the scheduling order because of conflicting schedules between clients and counsel.
4. And some clients have traveled and/or are outside of the CNMI, thus necessitating more time to contact or locate them, in addition to the fact that many of the Plaintiffs need a translator to communicate effectively with counsel, especially regarding their ability to effectively convey their emotions, feelings and thoughts regarding how the termination of their employment affected them emotionally.
5. Plaintiffs ability to present supporting evidence and affidavits in opposition to the

Motion is also hampered by the fact that while discovery deadline (cut-off) has passed and 20 depositions (16 by Defendant and 4 by Plaintiffs) have been taken, the depositions (transcriptions) are in various stages of being completed and cannot be provided to the Court in the form required by the rules at this stage. Additionally, counsel for Defendant has given notice of his intent to take the depositions of 32 additional Plaintiffs.

6. Pursuant to FRCP. Rule 56(f) plaintiffs request that upon considering the motion and opposition herein, if cause appears warranting the same, that the court as deemed necessary grant plaintiffs additional time to file affidavits, or grant an appropriate continuance to allow plaintiffs to adequately offer evidence and oppose the motion for summary judgment.

JOE HILL
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/S/

JOE HILL
Declarant